

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

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KEILEE FANT, et al.

Plaintiffs,

v.

THE CITY OF FERGUSON,

Defendant.

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Case No. 4:15-CV-00253 AGF

**PLAINTIFFS' MOTION TO DISQUALIFY AND  
EXCLUDE THE TESTIMONY OF DOUGLAS BEACH**

Plaintiffs, by and through undersigned counsel, respectfully move the Court to disqualify and exclude the proposed expert testimony of Judge Douglas Beach and, in support, state as follows:

1. The City seeks to have Judge Beach testify as an expert on the practices of the Ferguson court and on state law.
2. Judge Beach's proposed opinions and testimony should be excluded because his proposed testimony does not meet the requirements of Rule 702 of the Federal Rules of Evidence and applicable caselaw.
3. Specifically, Judge Beach's proposed testimony is inadmissible because:
  - a. Judge Beach is not qualified to offer the opinions he seeks to provide.
  - b. His testimony is irrelevant, as it concerns state law, whereas this case concerns matters of federal constitutional law.
  - c. His opinions rely solely on the testimony of a single witness in the case.
  - d. Many of Judge Beach's opinions are matters of law.

WHEREFORE, based on the foregoing, and the reasons more fully explained in the supporting memorandum of law filed contemporaneously herewith, Plaintiffs request that the Court grant the Motion.

Dated: April 12, 2022

Respectfully submitted,

**ARCHCITY DEFENDERS**

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